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April 12, 2013

Via ECF

Honorable Carol Bagley Amon, Chief Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201
Facsimile: (718) 613-2416

Re: *Morales et al. v. Clean Touch Car Wash*, No. 2:13-cv-00991 (SJF)(MJB)

Dear Judge Amon,

We represent Plaintiffs in the above-referenced matter. We write to attempt to correct a mistake Plaintiffs made on the Civil Cover Sheet.

Plaintiffs filed their Class Action Complaint in the Eastern District of New York, Brooklyn. Pursuant to Local Rules 50.1(d)(3) and 50.2(f), we write to respectfully request that designation of the case as a Long Island case be canceled and that the case be reassigned to Brooklyn.

A substantial part of the events or omissions giving rise to the Plaintiffs' claims occurred in Richmond County and not in Nassau or Suffolk Counties. Plaintiffs worked at Clean Touch Car Wash in Staten Island, New York and all of the acts that give rise to Plaintiffs' claims occurred in Staten Island. *See* Comp. ¶¶ 1, 14. Plaintiffs incorrectly answered "yes" to question 2(a) of the Local Rule 50.1(d) questions on page two of the Civil Cover Sheet, indicating in error that the relevant events or omissions occurred in Nassau or Suffolk County, and causing the case to be sent to Long Island.

In fact, there is no connection between Plaintiffs' claims and Nassau or Suffolk Counties, and all parties reside in Richmond County. *See* Comp. ¶¶ 15, 19, 22, 24. Additionally, counsel for both parties are located in New York and Kings County; thus, the Brooklyn courthouse is



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more easily accessible to parties and witnesses. Accordingly, reassigning the case to Brooklyn would serve the convenience of all parties.

For the foregoing reasons, Plaintiffs respectfully request that the Long Island designation be canceled and the case be reassigned to Brooklyn. Defendants consent to this request and have not yet served their Answer, which is due on April 22, 2013. Both parties agree they do not want to start the case before the Court determines whether the case would be reassigned.

We appreciate the Court's attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Reena Arora', followed by a horizontal line extending to the right.

Reena Arora

cc: Lyle S. Zuckerman, Esq.
Justin M. Swartz, Esq.
Julia Dietz, Esq.